

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America

v.

JEFFREY A. STEVENS

Case No. 16-mj-186-TLW

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept. 19, 2016 through on or about Sept 22, 2016 in the county of Tulsa in the  
Northern District of Oklahoma, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 875(c)

Communication of Threats in Interstate Commerce

18 U.S.C. § 1512(a)(2)

Attempt to Influence Testimony of a Witness by Threat of Physical Force

This criminal complaint is based on these facts:

See Attached Affidavit by FBI SA TFO Lissa Kennedy

☒ Continued on the attached sheet.

  
Complainant's signature  
FBI TFO Lissa Kennedy  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/6/2016

  
Judge's signature

City and state: Tulsa, OK

Magistrate Judge T. Lane Wilson  
Printed name and title

FILED

OCT 06 2016

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

AFFIDAVIT

Affiant, Lissa Kennedy, Task Force Officer (TFO) of the Joint Terrorism Task Force (JTTF) for the Federal Bureau of Investigation (FBI), being duly sworn under oath, states:

1. I have been assigned as a Task Force Officer of the FBI for approximately 2 years. I have been a police officer for the Grand River Dam Authority Police Department since December of 2010. I am currently assigned to the Tulsa Resident Agency of the FBI's Oklahoma City Division. Since being assigned to the Joint Terrorism Task Force (JTTF) of FBI, I have investigated violations of federal law, to include federal violations concerning threats to national security. During my career, I have participated in hundreds of interviews of victims, suspects, arrestees, witnesses, cooperating individuals, and informants. I have gained experience through training in courses and work related to conducting these types of investigations.

2. The statements in this affidavit are based in part on my own investigation, information provided by other Special Agents of the FBI and on my experience and background as a Task Force Officer with the FBI. Since this affidavit is being submitted for the limited purpose of securing a Criminal Complaint and Arrest Warrant, I have not included each and every fact known to me concerning this investigation.

3. On September 16, 2016, Tulsa Police Department (TPD) Officer Betty Shelby shot and killed Terence Crutcher an adult, black male. As a result, national news organizations, local news affiliates, and multiple social media outlets reported, discussed, and otherwise opined about the facts and circumstances surrounding the shooting.

4. The Tulsa Police Department's website, [www.tulsapolice.org](http://www.tulsapolice.org), contains a link to their Internal Affairs Investigations Department<sup>1</sup>. The Internal Affairs Investigations Department website provides a medium of communication through which a person may file a "Citizen's Complaint" against Tulsa Police Department employees. Reporting persons may file their complaint by completing the online Citizen Complaint form<sup>2</sup>. The Citizen Complaint form includes sections-to-be-completed that are titled "Description of Incident," "Officer(s)/Employee(s)," "Witnesses," and "Your Information." Above the "Submit" button, the Citizen Complaint form provides an attestation warning that reads, **"PLEASE READ BEFORE SUBMITTING. By clicking the submit button I certify the statements in this form are true."**

5. Beginning or about September 19, 2016, and continuing through on or September 22, 2016, Connecticut resident Jeffrey A. Stevens completed and submitted approximately ten online Citizen Complaint forms. Stevens transmitted the communications from IP address 208.103.77.58. Stevens communications to the Tulsa Police Department Internal Affairs Unit were transmitted in interstate commerce.

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<sup>1</sup> <https://www.tulsapolice.org/content/internalaffairs.aspx>

<sup>2</sup> <https://www.tulsapolice.org/content/tpd-citizen-complaint.aspx>

6. On September 19, 2016, at 6:18 p.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/18/2016  
**Incident Location:** On the road  
**Incident Description:** The psychotic pile of shit who MURDERED the unarmed civilian who broke down is going to be executed, as are ALL psychotic shitbags you and other PDs hire across this Nation who murder unarmed civilians. They are all going to be killed.

7. On September 20, 2016, at 1:02 p.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/18/2016  
**Incident Location:** You fucking corrupt psycho, God-complex, ego-driven ASSHOLES know where.  
**Incident Description:** This is the straw. The revolution starts now. The psycho cunt who never should have been given a badge, as well as all her cohorts who patted her on the back and said "Good Shoot" are going to be executed unless you put them behind bars on MURDER charges. Additionally, unless the Prosecutor & the Judge deny bail, they too will be executed. America is NOT a Police State in which any mental defective owning a badge can murder at will. It's time for America to make a stand and it will. Do the right thing or die. There are no other choices.

8. On September 20, 2016, at 4:28 p.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** The entire Nation knows where

**Incident Description:** The Tulsa PD Chief is going to be killed. He is corrupt. Not only has he hired a staff full of psychotic, racist, murderous scum and refused to put a murderer behind bars, he has also presided over and created an extortion ring. He must be, and IS GOING TO BE killed. "Justice for All", right? You seriously thought you could get away with fucking people forever? Death is coming. Justice is coming.

9. On September 22, 2016, at 9:25 a.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** The MURDER you psychotic shit committed  
**Incident Description:** The Tulsa PD had a documented history of planting drugs on travelers. This is something you already know. Way before this incident, a long list of corrupt shit in Tulsa who routinely victimize innocent people had already been complied. Now is the time that EVERYONE on that list is going to start being killed. Cops, Prosecutors, Judges, family members. Citizens are going to end it, along with your lives. As you know, whoever comes forward first gets immunity. In this case though, those who do not will not be prosecuted.....they will be killed.

10. On September 22, 2016, at 9:42 a.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** The murder of an innocent man  
**Incident Description:** The basic right to Life, Liberty & the Pursuit of Happiness for Citizens is greater than the ego of psychotic, racist shit who were mistakenly given a badge & a gun. If killing every last one of you and your families.....your wives....your children is what

**it takes to drive that point home, so be it. You ARE NOT GODS.**

11. On September 22, 2016, at 10:01 a.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016

**Incident Location:** The murder of an innocent man

**Incident Description:** Ron Palmer, who has developed a culture of corruption and victimizing innocent civilians, along with his family is going to be burned to death. Yeah, he'll be guarded for a while, and then thinking there wasn't any real threat, when you scum least expect it....he will be dead, along with his entire blood line. Then each of you who didn't speak up. Tell me, when you & your families are bleeding or burning to death, will you still believe it was worth it to fuck Americans?

12. On September 22, 2016, Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016

**Incident Location:** Murder

**Incident Description:** Is the filling of the pockets of corrupt, psychotic cops worth more than your freedom? Is it worth more than the lives of your children? It started out with just under 100 Enforcers going to Tulsa. It has grown to well over 1000. Cops are going to be killed. Anyone who covers up corruption is going to be killed

13. On September 22, 2016, at 10:15 a.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** Murder  
**Incident Description:** Spill your guts to the Feds, even to questions they don't ask, or your kids will start dying. This ends now.

14. On September 22, 2016, at 10:34 a.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** Murder  
**Incident Description:** The last words your child will hear are the same words that will be burned into his or her corpse: "Your parent decided a \$100 kickback for fucking an innocent civilian was worth more than you".

15. In or about the afternoon hours of September 22, 2016, Tulsa County District Attorney Steve Kunzweiler held a press conference. The District Attorney announced that Tulsa Police Department Officer Betty Shelby had been charged with First Degree Manslaughter and that an arrest warrant had been issued for her arrest.

16. On September 22, 2016, at 4:37 p.m., Stevens transmitted from IP Address 208.103.77.58 the following communication via the Citizen Complaint form:

**Incident Date:** 09/16/2016  
**Incident Location:** Murder  
**Incident Description:** You think this gets you off the hook? It was MURDER, not manslaughter. It was a execution.

**Betty is not going to get 3 years probation and a pension, she is getting a bullet through her brain. America needs to, and is finally going to make an example.....and it won't stop with her. Every corrupt shit asshole cop who filed a report stating that Crutcher was reaching through his CLOSED window is also going to be killed.**

17. Using the IP provider search tool feature located on the internet website [www.ultratools.com](http://www.ultratools.com), Affiant determined the service provider for IP Address 208.103.77.58 to be Atlantic Broadband, LLC. The business address for Atlantic Broadband, LCC is 1 Batterymarch Park, Suite 405, Quincy, Massachusetts, 02169.

18. A Federal Grand Jury Subpoena for the IP Address subscriber information record associated with IP Address 208.103.77.58 was served on Atlantic Broadband, LLC.

19. Atlantic Broadband, LLC, promptly responded to the Federal Grand Jury Subpoena by providing the requested records. The records showed that, on the relevant dates and times, the subscriber for IP Address: 208.103.77.58 was "D.P.", a person known to the FBI. The physical mailing address associated with the IP Address and "D.P." was 20 Church Street, Apartment 10, East Lyme, Connecticut, 06333. Atlantic Broadband, LLC, records also showed the Modem Identifier used at the time was 90b1.345f.e551. Atlantic Broadband, LLC, records also showed the customer account number was 8282300180185718.

20. Using the website [www.accurint.com](http://www.accurint.com)<sup>3</sup>, Federal Bureau of Investigation Special Agent Matt McCullough conducted a search pertaining to the address "20 Church

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<sup>3</sup> [www.accurint.com](http://www.accurint.com) is a commercial, fee-based service which contains a searchable database of collected publicly available information.



Street, Apartment 10, East Lyme, Connecticut, 06333.” The results of the search indicated an individual named “Jeffrey A. Stevens” resided at the address from approximately March 2001 to the present. A search pertaining to the name “Jeffrey A. Stevens” who was associated with the address, further showed Jeffrey A. Stevens had a criminal history.

21. Thereafter, Affiant obtained a Criminal History Report for Jeffrey A. Stevens. The report showed the Norwich, Connecticut Police Department arrested Stevens on December 6, 2005, for the felony crime of First Degree Threatening and the misdemeanor crime of Reckless Endangerment. The report showed that on May 13, 2008, Stevens was subsequently convicted of these crimes in the State of Connecticut. As a result of his conviction for the felony crime of 1<sup>st</sup> Degree Threatening, Stevens received a sentence of one year in jail, one year suspended sentence, and one year of conditional discharge. For his conviction for the misdemeanor crime of Reckless Endangerment, Stevens received a sentence of six months in jail, six months suspended (consecutive) and one year of conditional discharge.

22. Affiant also conducted review of other FBI investigations and determined Stevens was previously interviewed by the FBI on two occasions, once in 2012 and once in 2014. FBI Special Agents interviewed Stevens in 2012 and 2014 because Stevens transmitted/posted threatening and inflammatory communications –via email and the social media website Facebook – targeting United States Senator Kelly Ayotte, United States Congressman John Boehner, Fox News, and Wayne LaPierre of the National Rifle Association (NRA).

23. On September 28, 2016, FBI Special Agent Matt McCullough spoke telephonically with FBI Special Agent Amy Noto of the FBI's New London Resident Agency located in New London, Connecticut. Special Agent Noto advised when she interviewed Stevens on November 12, 2013, he admitted making inflammatory statements against U.S. Senator Kelly Ayotte, U.S Congressman John Boehner, and Wayne LaPierre of the NRA via postings from his Facebook account.

24. Special Agent Noto advised that at the completion of her interview with Stevens, she explicitly warned him that if he continued to send threatening or harassing electronic communications in the future, he may be prosecuted criminally. Special Agent Noto further stated Stevens appeared to clearly understand this admonishment at the time she interviewed him, and did not make any indication that he did not understand the admonition.

25. On October 3, 2016, FBI Special Agent Noto interviewed Stevens regarding the threats made to TPD. Special Agent Noto showed Stevens the communications, as set forth above, that TPD received from IP Address 203.103.77.58. Stevens admitted to writing and sending the communications. Stevens told Special Agent Noto, "I didn't say I'm going to do anything, I'm just predicting these things will happen." Stevens further stated, "I'm very upset. My wording was bad. Maybe I had a couple of beers." Additionally, Stevens admitted that he used such inflammatory language because he was trying to get the attention of the police chief in an effort to change hiring practices.

26. On October 4, 2016, Tulsa FBI TFO Chris Claramunt interviewed TPD Chief Chuck Jordan. TFO Claramunt showed Steven's email communications to Chief Jordan.

After reading the communications, Chief Jordan told Claramunt that the communications caused him to be concerned for his safety and for the safety of TPD Officers.

27. On October 5, 2016, FBI Special Agent McCullough spoke with TPD Officer Betty Shelby after she was provided with Steven's threats. After reviewing the threats, Officer Shelby advised she believed the threats to be true and they made her fear for her safety and the safety of her family members. Officer Shelby further stated the communications made her feel threatened, intimidated, and harassed.

28. On October 6, 2016, DA Steve Kunzweiler advised that upon his review of Steven's threats, he felt threatened and feared for his safety and the safety of his family. DA Kunzweiler further stated that he took precautions to further protect himself and his family because of the threats sent by Stevens.

29. On October 6, 2016, SA McCullough spoke with Tulsa County Judge Doug Drummond. Judge Drummond stated that he viewed the communications as credible threats and it made him concerned for his safety and the safety of his family. Judge Drummond said that although the communications did not use his name specifically, he felt the threat was aimed towards him because he will be the presiding judge over the prosecution of Officer Shelby. Judge Drummond also said that he would share the threat with his family so they could also be aware and could take extra precautions for their safety.

#### **TECHNICAL TERMS**

30. Based on my training and experience, I use the following technical terms to convey the following meanings:


- a. IP Address: The Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address looks like a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.
- b. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

31. Based on her investigation and the investigation of others, Affiant believes the ten communications sent on September 19, 2016, through September 22, 2016, from Stevens via the IP Address 208.103.77.58 to the Tulsa Police Department website via the Citizen Complaint form:


- were transmitted in interstate commerce from the State of Connecticut to the State of Oklahoma, using an Internet Service Provider located in Massachusetts;
- were transmitted by Jeffrey Allen Stevens, a resident of 20 Church Street, Apartment 10, East Lyme, Connecticut, 06333, the same address as the subscriber of the IP Address sending the threatening communications;
- were transmitted by Stevens who has a prior felony conviction in the State of Connecticut for Threatening and has been interviewed twice by FBI Special Agents for sending threats via email and Facebook postings;
- contained threats of violence and death by the execution of Tulsa Police Department Officers, the current Tulsa Police Department Chief, former Tulsa Police Department Chief Ron Palmer, the Tulsa County District Attorney, a Tulsa County Magistrate Judge, their family members and children;

- contained threats of violence and execution made towards witnesses in the investigation of the death of Terence Crutcher (*i.e.*, other Tulsa Police Department Officers);
- contained threats of violence and execution made toward the Tulsa County District Attorney and presiding judge over the case involving TPD Officer Betty Shelby;
- contained threats of violence and death to the victims which were clear, specific, and explicit;
- sought to use threat of physical violence and death to influence the testimony of any person (*i.e.*, other TPD police officers) involved in cases involving TPD Officer Betty Shelby;
- were transmitted by Stevens for the purpose of issuing a threat, or with knowledge that the communication would be viewed as a threat;

For the above states reasons, Affiant believes probable cause exists that Jeffrey Allen Stevens violated Title 18, U.S.C. 875(c) - Communication of Threats in Interstate Commerce, and Title 18, U.S.C. 1512(a)(2) - Attempt to Influence Testimony of a Witness by Threat of Physical Force.

  
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Lissa Kennedy  
Task Force Officer  
Federal Bureau of Investigation  
Tulsa, Oklahoma

Subscribed and sworn to before me this 6<sup>th</sup> day of October, 2016.

  
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T. Lane Wilson  
United States Magistrate Judge